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14 (*Subject to pro hac vice admission*)

15 Attorneys for Plaintiff
16 CHILDREN'S HEALTH DEFENSE

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 CHILDREN'S HEALTH DEFENSE,

21 Plaintiff,

22 v.

23 FACEBOOK, INC., et al.,

24 Defendants.

Case No. 20-cv-05787-SI

**DECLARATION OF RITA
SHREFFLER**

DECLARATION OF RITA SHREFFLER

I, Rita Shreffler, declare as follows:

1. I am the Director of Communications for Children’s Health Defense (“CHD”), which is the plaintiff organization in this action, *Children’s Health Defense v. Facebook, Inc., et al.*, 3:20-cv-05787-SI. This declaration is made in support of Plaintiff CHD’s Motion to Stay Judgment as to Defendant Science Feedback on good cause to extend time for foreign service, or for indicative ruling as to timeliness of June 24, 2021 service. If called as a witness, I could and would testify competently to the facts herein, except as to those matters stated on information and belief.

2. I am informed by Heidi Kidd, CHD’s Treasurer, and thereupon believe that, based on Mr. Kidd’s review of CHD’s pertinent bank records, CHD has paid the following monies in relation to service of process on the French corporate defendant, Science Feedback: On October 31, 2020, CHD paid Ms. Breton \$3,077.44 for her certified translation services. In September through October, 2020, CHD also paid ASAP Process Servers \$2,428.13 for its efforts to serve all defendants, including its multiple efforts to serve Mr. Vincent abroad. I am informed by Mr. Teich, co-counsel for CHD in this action that, on or about December 20, 2021, he received from Ms. Breton a copy of the French translation of its First Amended Complaint, and request for additional payment to translate the Second Amended Complaint and related documents. On January 14, 2021, CHD paid Ms. Breton an additional \$9,405.30 to provide a certified French translation of the SAC and Exh. “B” (Dkts. #65, 65-4.) On or about January 30, 2021, CHD received from Ms. Breton a certified French translation of the SAC. On or about February 21, 2021, CHD received from Ms. Breton a certified French translation of the SAC Exh. B. All told, CHD engaged with Ms. Breton and/or ASAP to render French translations of its Second Amended Complaint (“SAC”), SAC Exhs. “A” and “B” and eleven other case-related civil filing documents, which combined total well over 400-pages of text. On March 13, 2021, CHD paid ASAP Process Servers \$1,589.38 for having initiated service of Science Feedback under the Hague Convention, On or about July 22, 2021, CHD paid Ms. Breton an additional \$1,018.80 for a certified English translation of the French Ministry of the

1 Interior attestation of service and related documents, for a combined total expenditure on
2 translations of \$13,501.54. Thus, CHD has spent over \$17,000 to date in its efforts to serve
3 Science Feedback.

4 3. On information and belief, attached hereto as **Exhibit “A”** are true and correct
5 copies of selected documents which Mr. Teich received on or about July 15, 2021, from the
6 French Ministry of Justice with respect to its effort to serve Science Feedback under the Hague
7 Convention.

8 3. On information and belief, attached hereto as **Exhibit “B”** are true and correct
9 copies of Ms. Breton’s certified English translation of the French Ministry of Justice
10 documents referenced in Exhibit “A.”

11 4. On information and belief, attached hereto as **Exhibit “C”** is a true and correct
12 copy of CHD’s index of service documents for which CHD retained Ms. Breton to translate
13 from English to French.

14 5. On information and belief, attached hereto as **Exhibit “D”** are true and correct
15 copies of ASAP’s September 28, 2020 DHL waybill and transport label for mailed service of
16 the case-related documents to Mr. Emmanuel Vincent, Science Feedback, 7-9 rue de
17 Tocqueville, 75017 Paris France.

18 I declare under penalty of perjury under the laws of the United States that the foregoing
19 is true and correct to the best of my knowledge and that this declaration was executed in
20 Nixa, Missouri, on July 26, 2021.

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RITA SHREFFLER

24 Communications Director
25 Children’s Health Defense
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